

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT  
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Jahmir Ashley-Boyd

(Enter above the full name of the plaintiff in this action)

COMPLAINT

V.

Thomas Manti

Civil Action No. \_\_\_\_\_

(To be supplied by the Clerk of the Court)

RECEIVED

APR 12 2022

(Enter the full name of the defendant or defendants in this action)

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH, CLERK

INSTRUCTIONS; READ CAREFULLY

1. This complaint must be legibly handwritten or typewritten, signed by the plaintiff and subscribed to under penalty of perjury as being true and correct. All questions must be answered concisely in the proper space on the form. Where more space is needed to answer any question, attach a separate sheet.
2. In accordance with Rule 8 of the Federal Rules of Civil Procedure, the complaint should contain (1) a short and plain statement of the grounds upon which the court's jurisdiction depends, (2) a short plain statement of the claim showing that you are entitled to relief, and (3) a demand for judgment for the relief which you seek.
3. You must provide the full name of each defendant or defendants and where they can be found.
4. You must send the original and one copy of the complaint to the Clerk of the District Court. You must also send one additional copy of the complaint for each defendant to the Clerk. Do not send the complaint directly to the defendants.
5. Upon receipt of a fee of \$400.00 (a filing fee of \$350.00, and an administrative fee of \$50.00), your complaint will be filed. You will be responsible for service of a separate summons and copy of the complaint on each defendant. See Rule 4, Federal Rule of Civil Procedure.

6. If you cannot prepay the \$400.00 fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth in the application to proceed in forma pauperis. See 28 U.S.C. §1915. (If there is more than one plaintiff, each plaintiff must separately request permission to proceed in forma pauperis.)

7. If you are given permission to proceed in forma pauperis, the \$50.00 Administrative Fee will not be assessed. The Clerk will prepare and issue a copy of the summons for each defendant. The copies of summonses and the copies of the complaint which you have submitted will be forwarded by the Clerk to the United States Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

#### QUESTIONS TO BE ANSWERED

1a. Jurisdiction is asserted pursuant to (CHECK ONE)

☒ 42 U.S.C. §1983 (applies to state prisoners)

☐ Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

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1b. Indicate whether you are a prisoner or other confined person as follows:

☒ Pretrial detainee

☐ Civilly-committed detainee

☐ Immigration detainee

☐ Convicted and sentenced state prisoner

☐ Convicted and sentenced federal prisoner

☐ Other: (please explain) \_\_\_\_\_

5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

☐ Yes ☒ No

If your answer is "Yes," briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

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If your answer is "No," briefly explain why administrative remedies were not exhausted.

Constitutional rights were violated by  
police not prison officials.

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6. Statement of Claims

(State here as briefly as possible the facts of your case. Describe how each defendant violated your rights, giving dates and places. If you do not specify how each defendant violated your rights and the date(s) and place of the violations, your complaint may be dismissed. Include also the names of other persons who are involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach a separate sheet if necessary.)

Between November 9<sup>th</sup>, 2021 - November 10<sup>th</sup>, 2021 Detective  
Thomas Mantici of the Deptford Twp Police Dept. in New Jersey  
illegally placed a GPS tracking device on a Black  
2008 Range Rover owned/operated by myself at an unknown  
location without a warrant. The GPS was said to have  
been placed on vehicle to "investigate a prior burglary"  
that allegedly occurred November 9<sup>th</sup>, 2021 in Deptford Twp.

The night of November 10<sup>th</sup> 2021 into the morning hours of November 11<sup>th</sup> 2021, Detective Thomas Manticci illegally tracked me along with 2 passengers Joseph Smith and Erik King into the state of Pennsylvania utilizing the GPS tracking device placed onto vehicle. Detective Thomas Manticci contacted PA State Police approximately 2<sup>o</sup>clock in the morning and related he was currently tracking a 2008 Range Rover that was supposedly plotting at a location PA State Police recieved a request to respond to an active burglar alarm. Detective Thomas Manticci provided Pennsylvania State Police with updates of location and direction of travel of my vehicle as he was currently tracking my vehicle with GPS device. PA State Police actually never responded to active burglar alarm instead they targeted my vehicle solely because of information provided by Detective Manticci. Two vehicles which later said to be Pennsylvania State Police aggressively approached my vehicle on highway Rt. 33 which at the time was very dark and wooded area and activated police lights. In fear of known Police Brutality and current surroundings a pursuit engaged in effort to get to a 'safe place' to pull over. PA State Police began to dangerously ram their vehicles into my vehicle which resulted in a motor vehicle accident causing physical injuries to myself and the passengers of the vehicle. As a result of our injuries we were taken to St. Lukes hospital and placed into custody and accused of the burglary that occurred in Pennsylvania where I remain in custody. Detective Thomas Manticci had no authority to place a GPS tracking device onto vehicle let alone have no jurisdiction to monitor such device in the State of Pennsylvania which violated my Fourth (another sheet attached)

## 7. Relief

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

Plaintiff respectfully requests the court to grant the following relief:

A. Issue an injunction ordering release from custody until

disposition of PA/NJ cases using illegal GPS information.

B. Award compensatory damages in the following amounts

1. \$50,000 For damage done to vehicle and confiscated property
2. \$250,000 For physical injuries suffered from Motor Vehicle Accident.
3. \$700,000 For mental anguish, lost of liberty, lost of wages due to incarceration, Seperation From Family, Emotional Stress, Humiliation, and pain & suffering all as results from fruits of illegal GPS tracking.

C. Award punitive damages in the amount of \$250,000.

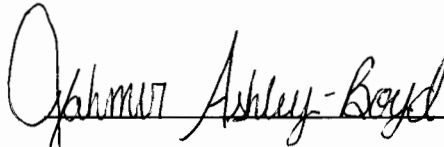
D. Grant such other relief as it may appear plaintiff is entitled.

8. Do you request a jury or non-jury trial? (Check only one)

☒ Jury Trial ( ) Non-Jury Trial

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 7<sup>th</sup> day of April, 2022



Signature of plaintiff\*

(\*EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF. REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT).